Hello Ms. Saare-Edmonds,

The County of Los Angeles Department of Public Works has reviewed the State's draft Model Water Efficient Landscape Ordinance and prepared comments for DWR's consideration. The following represents input from our architectural engineering and water resources operations.

- We recommend keeping Irrigation Efficiency at .71. Changing to .92 will most likely limit us to subsurface drip irrigation only. This has proven to be problematic for long term maintenance and is not always the best choice. Keep the value of IE in the ETAF calculation the same, and make changes to the Plant Factor instead. This will encourage the use of lower water use plants. How does the designer/or regulating agency determine the correct IE before the system is installed, and how can it be measured without specialized equipment? Does an IE of 0.92 limit non-residential to only drip (no spray)? Does "amount of water beneficially used" equate to field capacity? If not, what does the term actually mean? If the soil is very sandy, there will be greater loss to gravitational water. Has anyone determined if 0.92 is actually possible in all landscape situations?

- What effect will the draft ordinance have on projects that have already gone through plan check, or have started plan check before the ordinance is passed?

- Is artificial turf considered landscape or hardscape? Note: research shows that artificial turf requires water for cooling and for sanitation.

- For Section 491. (ddd) - It defines plant factor for low water use plants as 0-3. Plant factor should start at 0.1 instead of 0.

- For Section 491. (yyy) - "water feature"…surface area included in the high water use hydrozone, and Section 492.4 (c) MAWA calculation – additional water allowance for SLA is 0.5 for residential and 0.6 for non-residential. The water use allowance for SLA (0.5 or 0.6) is less than the high water plant factor (0.7 to 1.0). This needs to be reconsidered. For example, If a civic minded group wanted to convert an empty lot into a community pool, this ordinance would prevent it unless there was a huge area for extremely low water use plants to offset the difference. It is a disadvantage for urban areas where such a facility would be most needed.

- Section 492.7 (m) requires that a precipitation rate of 1.0 inches per hour is not exceeded in any portion of the landscape. Precipitation rate is related to flow rate. Low flow is not necessarily better for water saving. Low flow sprays generally have smaller water droplets than a higher flow spray. The smaller the droplets the greater the overall surface area and thus higher evaporation loss. The maximum precipitation rate should be based on conditions, such as slope or soil type, that contribute to runoff. A flat area of sandy soil should be allowed a higher precipitation rate than a hill of clay. Lowering precipitation rate would eliminate most rotors for large turf areas.

- For Section 492.16 (Stormwater Management and Rainwater Retention) - Item (b) indicates that project applicants shall refer to the local agency or Regional Water Quality Control Board for information on any applicable stormwater ordinance and stormwater management plans. Additional language is recommended to encourage applicants to pursue partnerships or participation with the jurisdiction in which the project is located to investigate if the BMPs proposed for the project would help the jurisdiction meet its goals or regulatory requirements to infiltrate water, in lieu of sending it into an MS4 system.

- For Section 492.17 (b) - It is not clear where model homes are required to be landscaped (front yard only, front and back yards, etc.). We recommend that this requirement should be further clarified.

Thank you for the opportunity to provide input.
Regards,
Robert Cadena
Government Relations Group
County of Los Angeles Dept of Public Works